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ADMITTED: NEW YORK, EIGHTH CIRCUIT
SECOND CIRCUIT,
US COURT ON INTERNATIONAL

October 17, 2024

Via ECF

The Honorable Sarah Netburn
Magistrate Judge, United States District Court
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

On behalf of defendants WAMY, we are compelled to respond to PECs letter of today (ECF 10442). First, PECs suggestion that WAMY's counsel not be provided with a complete unredacted copy of the Letter is unfair and, once again, contrary to this Court's Order that PECs file an unredacted version of the letter. (ECF No. 10421). As they have from the beginning with respect to this issue, PECs seek to exploit serious allegations against WAMY's counsel from an anonymous source yet keep from WAMY's counsel the full information about the Letter. Plaintiffs' counsel request creates an informational unbalance between the parties which is unfair and unreasonable. It is imperative that we have a level playing field on this issue. PECs proposal would defeat that.

Second, PECs I assert that the origin or authorship of the letter is irrelevant. However, this is precisely the issue we take with the Letter. The provenance of the letter is crucial. WAMY's Counsel have legitimate and serious concerns and suspicions regarding the Letter's source. Contrary to PECs' assertion, these issues bear directly on whether the substance of the letter has merit. As to the question posed about other people in the room helping the witness answer questions, we will certainly answer that question directly in our response on November 4.

Thank you for your consideration.

Respectfully,

/s/ Omar Mohammedi

Omar Mohammedi

/s/ Frederick Goetz

Frederick Goetz